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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL NO.: 02-320 (AET)

v.

NOTICE OF OMNIBUS MOTIONS

RONALD E. BLACKWELL,

FILED

TO: Trebby Williams, Assistant U.S. Attorney
402 East State Street
Room 430
Trenton, New Jersey 08608

AUG 21 2002

AT 8:30 M
WILLIAM T. WALSH
CLERK

MADAM:

PLEASE TAKE NOTICE, that the Defendant, Ronald Blackwell, through his attorney, Victor J. Caola, Esq., shall move before the Honorable Anne E. Thompson, Chief Judge, United States District Court, District of New Jersey, Trenton, New Jersey on the 16th day of October, 2002, 9:00 a.m., a date set by the Court, for the following:

- i. Compelling the government to disclose evidence pursuant to F. R. Crim. P. 16(a)(1), directing the government to file Bill of Particulars pursuant to F.R. Crim. P. 7(f), and more specifically directing the government to disclose:
 - (A) the extent that any acts of indicted or unindicted co-conspirators are to be imputed to the Defendant; all names and addresses of co-conspirators, description of acts and date, time and place of said acts and basis for imputing the acts of the Defendant.
 - (B) to the extent that any hearsay conversations of any of the indicted or unindicted co-conspirators are to be imputed or attributed to the Defendant by virtue of his alleged part in the conspiracy, state; name of co-conspirator declarant, description of conversation, time, date and place of conversation and the basis for imputing the conversation to the defendant;
 - (C) any additional discovery thirty (30) days prior to trial as to as to the specifics

of any transaction or evidence constituting "other crimes or wrongs" which the government intends to introduce against the Defendant or his co-defendants at trial pursuant to R. 404(b) of the Federal Rules of Evidence.

2. Granting relief from prejudicial joinder pursuant to F.R. Crim. P.12;
3. Requiring the government to retain all rough notes taken by government law enforcement officers in the investigation and provide same to Defendant and/or the Court for inspection prior to the testimony of that person;
4. Requiring the government to provide Jencks material to the Defendant 24 hours prior to the opening statements at trial;
5. Compelling the government, pursuant to its obligations under the doctrine of Brady v. Maryland, 373 U.S. 83 (1963) to provide exculpatory or impeaching evidence with respect to the government or defense witnesses, including all other evidence tending to negate the guilt of Defendant, Ronald Blackwell, as to the offenses charged in the Indictment, including the names and addresses and statements of any person interviewed by the government who stated that they had no knowledge of wrongdoing by Defendant, Ronald Blackwell and all evidence in possession of the government intends to call as a witness at trial is untruthful;
6. Compelling the government to provide a written summary of testimony of any expert it intends to introduce at trial;
7. Compelling the disclosure of identities of any and all informants;
8. Suppressing physical evidence recovered from the person of Defendant pursuant to Federal Rules of Criminal Procedure 12(b)(3);
9. Permitting the Defendant, Ronald Blackwell, the right to make any additional motions which may be necessitated as a result of additional information acquired by the Defendant, including the right to raise certain defenses pursuant to F.R. Crim. P. 12(f); and
10. Permitting the Defendant, Ronald Blackwell, to join in on any Motions filed on behalf of co-defendants and to adopt the arguments of counsel where applicable;

PLEASE TAKE FURTHER NOTICE that counsel will rely upon the enclosed Brief, as well as oral argument.

By: 

VICTOR J. CAOLA
Attorney for Defendant,
Ronald Blackwell


Dated: 8/20/02

CERTIFICATION OF FILING AND MAILING

I hereby certify that on August 20, 2002, an original and one (1) copy of the within Notice of Omnibus Motions and Brief in support of the within Motion were sent via Federal Express to the Clerk's Office, United States District Court, District of New Jersey, Trenton, 402 East State Street, Trenton, New Jersey and a copy of same was mailed via Federal Express to Trebby Williams, Assistant U.S. Attorney, 402 East State Street, Trenton, New Jersey 08608.

I certify that the foregoing statement made by me is true. I understand that if any of the foregoing statement made by me is wilfully false, I am subject to punishment.

Dated: 8/20/2002



VICTOR J. CAOLA, ESQ.
Attorney for Defendant
Ronald Blackwell

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UNITED STATES
DISTRICT COURT

UNITED STATES DISTRICT COURT